

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) CR. NO. 1:06-cr-124-WHA
)
 ROBERT REYNOLDS)

MOTION FOR DOWNWARD DEPARTURE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to the United States Sentencing Commission, Guidelines Manual, Section 5K1.1, respectfully requests this Honorable Court to downwardly depart two (2) levels, in the sentence that would otherwise be imposed on Defendant Robert Reynolds, and as reasons therefore, submits the following:

Defendant Robert Reynolds provided information to the United States which has aided investigations in Georgia and New York involving the manufacturing, trafficking and possession of counterfeit compact disks (music) and dvd's (movies).

Wherefore, premises considered, the United States moves this Honorable Court for a downward departure from the calculated guideline range. This motion seeks a departure of two (2) levels.

Respectfully submitted this the 12th day of April, 2007.

LEURA G. CANARY
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CERTIFICATE OF SERVICE

I hereby certify that on April 12, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Christine A. Freeman,

Respectfully submitted,

LEURA G. CANARY
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